

EDWARD Y. KIM

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN THE MATTER OF THE TAX
LIABILITIES OF:

JOHN DOES, United States taxpayers who, at any time during the years ended December 31, 2014, through December 31, 2023, used the services of the Trident Trust Group, including its predecessors, subsidiaries, divisions, affiliates, and associates to establish, maintain, operate, or control any foreign financial account or other foreign asset; any foreign corporation, company, trust, foundation or other legal entity; or any foreign or domestic financial account or other asset in the name of such foreign entity.

Case No. 24 Misc. 594

**NOTICE OF FILING OF *EX*
PORTE PETITION FOR LEAVE
TO SERVE “JOHN DOE”
SUMMONSES**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and supporting Declaration of Randy Hoozcko, the United States of America, by its attorney, Edward Y. Kim, Acting United States Attorney for the Southern District of New York, has filed this *ex parte* petition pursuant to Section 7609(f) of the Internal Revenue Code, 26 U.S.C. § 7609(f), for leave to serve Internal Revenue Service “John Doe” summonses (collectively, the “Summonses”) upon FedEx Corporation; DHL Express (USA), Inc.; United Parcel Service, Inc.; the Federal Reserve Bank of New York; The Clearing House Payments Company LLC; HSBC Bank USA, National Association; The Bank of New York Mellon Corporation; Wells Fargo Bank, National

Association; Citibank, National Association; UBS AG; Bank of America, National Association; Deutsche Bank Trust Company Americas; and Nevis Services Limited.

The Court's determination on the United States' petition "shall be made ex parte and shall be made solely on the petition and supporting affidavits." 26 U.S.C. § 7609(h)(2). Because the pleadings filed in this proceeding will not be served upon any person or entity and no other filings are permitted from other persons or entities, this petition is ripe for the Court's consideration. The United States respectfully requests that the Court review its petition and supporting documents and enter the proposed Order at the Court's earliest opportunity.

Dated: New York, New York
December 17, 2024

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